

1.9.1



September 27, 2004

Dr. David South
Toxics Cleanup Program
Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452

Via e-mail

RE: Everett Smelter – Notice of Substantial Completion
Enforcement Order No. 02TCPNR-4059

Dear Dave:

I am writing to notify you that Asarco has completed removal of the Source material (i.e., material above 3,000 mg/kg As) from the fenced area. Sampling has been conducted to confirm the removal and results are being submitted to Ecology under separate cover. The attached map shows the Source area decision units that have been sampled to confirm the removal of Source material. In general, Phase 1a sampling protocol has been used to support this determination, although a few decision units have been remediated to the 150 mg/kg As level (i.e., Phase 2).

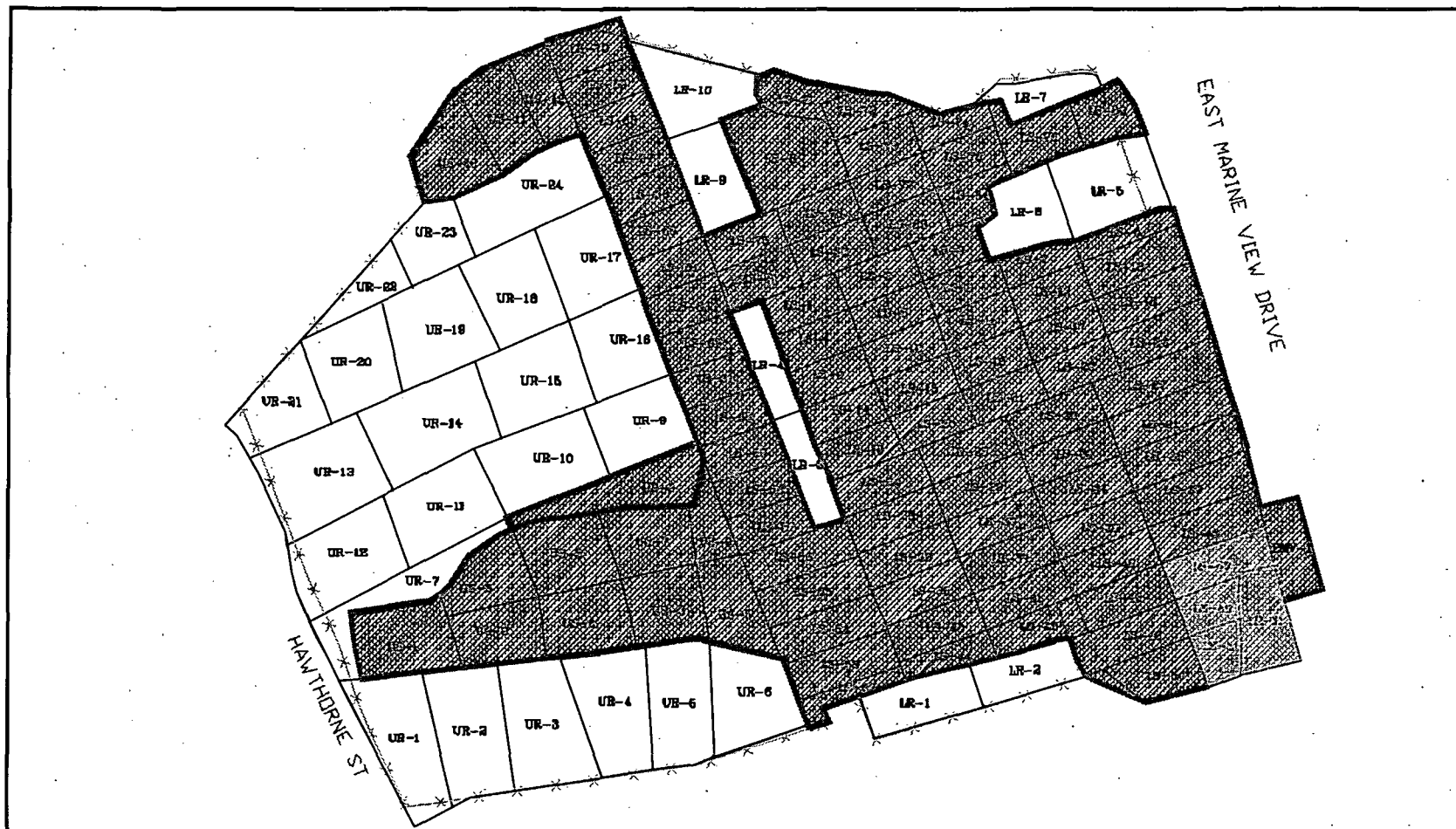
Asarco is continuing work on-site to meet the additional criteria for site cleanup. I will continue to update you regarding our progress this year in reaching the requirements of the Enforcement Order. If you have any questions regarding this matter, please call me.

Sincerely,

A handwritten signature in black ink that reads "David K. Nation".

David K. Nation, P.E.
Senior Manager of Projects and Analytical Services

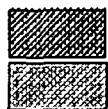
cc: Tom Aldrich
Don Robbins
Clint Stanovsky
Kevin Rochlin, EPA
Bud Alkire, EHA



9/18/04

I:\Everett Soils\Decision Unit Maps\Phase IA\Phase IA Soil Removal Status

LEGEND



FAIL



PASS



TESTED TO PHASE 2 - SOILS OVER 150 PPM REMOVED

PASSING
PERIMETER



FAILING
PERIMETER

Asarco Consulting, Inc.

EVERETT SMELTER INTERIM ACTION
PHASE IA SOIL REMOVAL STATUS

REMOVAL OF SOILS ABOVE 3,000 PPM As